

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

In re:

MARGARET W. REAVES
Debtor.

Case No. 21-00329-5-DMW

Chapter 13

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

NOW COMES the Debtor by and through counsel, and hereby opposes the Trustee's Motion to Dismiss dated June 28, 2021, filed under docket no. 67, and states that the Debtor's Chapter 13 bankruptcy case should not be dismissed, as follows:

In support hereof, the Debtor shows unto the Court as follows:

1. That the Debtor filed her bankruptcy case pro se.
2. That the Debtor now is represented by counsel.
3. That the Debtor intends to amend her plan, statements and schedules.
4. That the Debtor avers that she is current on her plan payments.

WHEREFORE, the Debtor prays that this Court deny the Trustee's Motion to Dismiss, and to confer such further relief, which appears just and proper.

On the 16th day of July 2021.

The Lewis Law Firm, P.A.

s/Robert Lewis, Jr.
ROBERT LEWIS, JR. NC Bar # 35806
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CERTIFICATE OF SERVICE

I, Robert Lewis, Jr. do hereby certify, under penalty of perjury, that I am of sufficient age to tender service; and that on this day I had served the attached RESPONSE TO TRUSTEE'S MOTION TO DISMISS file on June 28, 2021, under docket number 67, by regular U.S. mail or by Electronic Case Filing System, upon the parties set forth below:

John F. Logan (sent via CM/ECF)
Chapter 13 Trustee

Marjorie K. Lynch (sent via CM/ECF)
Bankruptcy Administrator

On the 16th day of July 2021.

The Lewis Law Firm, P.A.

s/Robert Lewis, Jr.
ROBERT LEWIS, JR. NC Bar # 35806
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